

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 23-758 (JLH)
	)	
WIZ, INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND PROPOSED ORDER**

WHEREAS, Plaintiff Orca Security Ltd. (“Orca”) and Defendant Wiz, Inc. (“Wiz;” collectively, the “Parties”) have served Priority Electronic Correspondence production requests (“Priority Requests”) on each other as well as corresponding objections and hit counts pursuant to the Stipulation and Order Regarding Discovery of Electronically Stored Information (D.I. 71; the “ESI Order”);

WHEREAS, the Parties have continued meeting and conferring regarding the Priority Requests;

WHEREAS, the current deadline to submit disputes regarding the Priority Requests is Tuesday, July 16;

WHEREAS, the Parties believe continuing their meet and confer efforts is likely to result in narrowing of their disputes;

WHEREAS, extending deadlines relating to Electronic Correspondence production requests will not affect the time for any Court hearing, conference, or trial;

IT IS HEREBY STIPULATED by the Parties, subject to the approval of the Court, that the following dates in the ESI Order (D.I. 71), shall be amended as follows:

Event	Current Date	Amended Date
Deadline to submit Priority Request disputes	July 16, 2024	July 19, 2024
Deadline to substantially complete production in response to Priority Requests	August 27, 2024	August 30, 2024
Deadline for objections to remaining Electronic Correspondence requests	The later of September 10, 2024 or within 21 days of receipt	The later of September 13, 2024 or within 21 days of receipt

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith II

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Jack B. Blumenfeld (#1014)  
Rodger D. Smith II (#3778)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
rsmith@morrisnichols.com

*Attorneys for Plaintiff*

July 9, 2024

RICHARD, LAYTON & FINGER, P.A.

/s/ Christine D. Haynes

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Frederick L. Cottrell, III (#2555)  
Kelly E. Farnan (#4395)  
Christine D. Haynes (#4697)  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801  
(302) 651-7700  
cottrell@rlf.com  
farnan@rlf.com  
haynes@rlf.com

*Attorneys for Defendant*

SO ORDERED, this \_\_\_\_\_ day of July 2024.

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The Honorable Jennifer L. Hall  
United States District Court Judge